

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:)
)
Keystone Gas Corporation,) **Case No. 22-12088**
) **Chapter 11**
Debtor.)

**OBJECTION TO RELIEF REQUESTED IN DEBOTR'S MOTION FOR ENTRY OF
AN ORDER (A) APPROVING DISCLOSURE STATEMENT, (B) SCHEDULING A
HEARING TO CONSIDER CONFIRMATION OF THE PLAN OF REORGANIZATION,
(C) ESTABLISHING VOTING AND OBJECTION DEADLINES, AND (D) APPROVING
BALLOTING, SOLICITATION, NOTICE, AND VOTING PROCEDURES
(Docket No. 155)**

The Debtor has filed its Motion for Entry of an Order (a) Approving Disclosure Statement, (b) Scheduling a Hearing to Consider Confirmation of the Plan of Reorganization, (C) Establishing Voting and Objection Deadlines, and (d) Approving Balloting, Solicitation, Notice, and Voting Procedures [Dkt. No. 155] (the “Motion”). Marle Production Co., LLC, an Oklahoma limited liability company (“Marle”), Yarhola Production Corporation, an Oklahoma corporation (“Yarhola”), Little River Energy Company, an Oklahoma company (“Little River”), J.J.&K. Oil Co., LLC, an Oklahoma limited liability company (“JJ&K), and Oakland Petroleum Operating Co., Inc., an Oklahoma corporation (“Oakland”) (collectively, “Objecting Creditors”), by and through their counsel, Gary M. McDonald of McDonald Law, PLLC, request that the Court defer action upon such Motion pending resolution of Objections to the Disclosure Statement filed by the Objecting Creditors this date.

Respectfully submitted,

/s/ Gary M. McDonald
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